

1 personally we own back to Metroplex or DLB, and I have
2 income from that, and I am furnished with a 1099.

3 JUDGE STEINBERG: When you say that we personally
4 own, who is the we?

5 THE WITNESS: Myself and my husband own the
6 equipment that we lease to Metroplex.

7 JUDGE STEINBERG: Thank you.

8 BY MR. KNOWLES-KELLETT:

9 Q Was that a situation that you worked out for tax
10 purposes?

11 A Yes. The accountant, Jim, told us that that's
12 what we needed to do; that we should own the equipment --

13 Q Okay.

14 A -- and then lease it back to DLB because of the C
15 chapter corporation that we're under.

16 Q Okay. And the purpose there was to save tax
17 money?

18 A Well, at the time DLB was not making any money,
19 you know. It was kind of -- we were struggling, and that
20 was the purpose to handle it that way.

21 It would also be like if we wanted to dispose of
22 one asset and keep another we could. That was part of it
23 also without having to I guess go through the hassle of
24 separating it.

25 Q Okay.

1 A That was my understanding of the way Jim explained
2 it to me.

3 Q Okay. In order to facilitate this, is it correct
4 that there are two accounts? There's a Brasher account and
5 a DLB account that are used in DLB's business?

6 A Yes, sir. Jim said that would make it easy to
7 track it for IRS if we had a separate account that we
8 deposited the monies into from -- because DLB received the
9 revenues from the income of the repeaters that we owned.

10 Q Okay.

11 A It would be easier to track it for IRS purposes if
12 we had a separate account rather than using all of
13 Metroplex's. That was his advice to us the way to handle
14 it, and I relied on him, you know, because he did both
15 personal, as well as, you know, my company taxes.

16 JUDGE STEINBERG: About how much income do you
17 derive, you and Mr. Brasher, your husband, derive from your
18 leasing of equipment to DLB per month?

19 THE WITNESS: Per month?

20 JUDGE STEINBERG: Or any other convenient time
21 that you want to tell me about. Per month? Per year?

22 THE WITNESS: Well, it's close to \$100,000. Over
23 \$100,000 because -- I guess about \$9,200 a month is the best
24 that, you know, I can give you an exact figure without going
25 to my 1099 forms.

1 JUDGE STEINBERG: Okay. So basically whoever the
2 bookkeeper is -- is that you?

3 THE WITNESS: Well, yes.

4 JUDGE STEINBERG: Do you take your DLB checkbook
5 and write a check --

6 THE WITNESS: Write a check over to Brasher.

7 JUDGE STEINBERG: -- over to the Brasher account?

8 THE WITNESS: Yes, sir.

9 JUDGE STEINBERG: Okay. And that's in addition to
10 your regular salary?

11 THE WITNESS: Yes, sir.

12 JUDGE STEINBERG: Thank you.

13 BY MR. KNOWLES-KELLETT:

14 Q Is that number, though, the gross number of money
15 paid over to the Brasher account by DLB?

16 A Yes, sir.

17 Q So out of that some of the expenses are paid?

18 A Yes. Our lease is paid from the income. The
19 income that Metroplex pays Brasher, the site lease money
20 comes out of Brasher to pay for the site lease.

21 Q And also the licensing and application fees?

22 A Yes. It comes out of the Brasher account. We
23 have monies in there for -- you know, put monies in there
24 for licensing and things like that.

25 THE REPORTER: Your Honor, I really do not want to

1 be a pain.

2 THE WITNESS: I'm sorry.

3 THE REPORTER: No. It's not your fault. It's
4 just the microphone has to be fairly close.

5 THE WITNESS: I'm sorry. Maybe I can just move
6 it.

7 THE REPORTER: That would be great.

8 THE WITNESS: Maybe I'll scoot up.

9 MR. KNOWLES-KELLETT: You're welcome to move the
10 notebook for now if you want.

11 JUDGE STEINBERG: I'll note for the record that
12 you're having a lot of trouble with your voice, and you said
13 it was because of respiratory difficulties.

14 THE WITNESS: Yes.

15 JUDGE STEINBERG: If you need to stop and take a
16 break or you need to sip some water or you need to get some
17 suckers or whatever to make you more comfortable, you just
18 let me know. Don't be shy.

19 THE WITNESS: Yes.

20 JUDGE STEINBERG: It doesn't look like you're shy.

21 THE WITNESS: No. I'm not, sir. It's just that I
22 thought it was going to get better, and it hasn't gotten
23 better all week.

24 JUDGE STEINBERG: Okay. If you --

25 THE WITNESS: Yes. If I need to I'll say so.

1 JUDGE STEINBERG: Don't be --

2 THE WITNESS: Can I just get me something out of
3 my purse?

4 JUDGE STEINBERG: Sure.

5 THE WITNESS: Okay.

6 JUDGE STEINBERG: Just do what you need to do to
7 be comfortable.

8 THE WITNESS: Okay.

9 JUDGE STEINBERG: This is not supposed to be
10 torture.

11 THE WITNESS: Well, I mean, it's not hurting.
12 It's just --

13 JUDGE STEINBERG: Yes. You're straining.

14 THE WITNESS: I'm not shy, Your Honor.

15 JUDGE STEINBERG: I didn't think so.

16 BY MR. KNOWLES-KELLETT:

17 Q When we discussed the Brasher account, is that
18 your personal checking account?

19 A No, sir. No.

20 Q That's a business --

21 A That a business account. It has nothing to do --
22 I have never used it for anything of a personal nature.

23 Q Okay. Who has check writing authority on the
24 Brasher account?

25 A Myself and Diane.

1 Q Has Carolyn Lutz ever signed checks on the
2 Brasher account?

3 A Yes, sir.

4 Q Okay. To your knowledge, has she ever done so
5 without your permission?

6 A No, sir.

7 Q Okay. And when she signs checks on the Brasher
8 account, whose signature does she sign?

9 A Mine with my permission.

10 JUDGE STEINBERG: If Ms. Lutz is signing a check
11 using your name, does she come and ask your permission every
12 single time?

13 THE WITNESS: Yes, sir.

14 JUDGE STEINBERG: Why don't you just sign it then?

15 THE WITNESS: Well, I'm not there. The only time
16 she's ever signed, Your Honor, would be if for some reason
17 Diane and I were not there like maybe one of the children
18 got sick and Diane was there and had to go home or
19 something.

20 JUDGE STEINBERG: And a check needed to be signed?

21 THE WITNESS: Yes, and something come up that she
22 needed. She always called. I need to write a check for so
23 and so.

24 JUDGE STEINBERG: Okay.

25 THE WITNESS: She was very good. I mean, I never

1 felt like she was going to write a check without asking me.

2 JUDGE STEINBERG: Okay.

3 THE WITNESS: It was nothing like that. It was
4 necessary to run a small business.

5 JUDGE STEINBERG: Thank you.

6 BY MR. KNOWLES-KELLETT:

7 Q Did she put any symbol on the check when she
8 signed it?

9 A Sometimes she would write "Okay per Pat," and
10 sometimes she didn't. I mean, you know, it was just she
11 talked to me, and as far as in her mind and mine I'm sure it
12 was okay. I asked her. She said okay, and we did it.

13 Q This was the customary practice in the business?

14 A Yes. Yes, I mean, because we all had to work
15 together. There was the three women.

16 Q Okay. Could you explain your relationship to
17 Carolyn?

18 A She is my sister.

19 Q Okay. I mean Carolyn Sue Lutz.

20 A Yes. Is my sister.

21 Q And Thomas, who testified today? How are you
22 related to him?

23 A That is my brother.

24 Q Okay. Now, DLB Enterprises operates a line of
25 business that's repeater access service. Is that correct?

1 Do you understand what I mean by that term?

2 A No. Just say it again. Maybe I didn't --

3 Q In the depositions we had various problems.

4 JUDGE STEINBERG: Don't say what we did in the
5 depositions --

6 MR. KNOWLES-KELLETT: Okay.

7 JUDGE STEINBERG: -- because I don't care.

8 MR. KNOWLES-KELLETT: Okay.

9 JUDGE STEINBERG: Just ask the question.

10 MR. KNOWLES-KELLETT: Okay.

11 JUDGE STEINBERG: What does DLB do?

12 BY MR. KNOWLES-KELLETT:

13 Q Okay. What service does DLB provide?

14 A Okay. We provide repeater service.

15 Q Okay.

16 A We do sales. We do maintenance, and we have
17 maintenance contracts. We do installs, removals and repair
18 on mobile equipment, repeaters.

19 Basically, you know, like I said, we install
20 radios in ambulances. We install radios in fire trucks,
21 motorcycles, police cars, --

22 Q Okay.

23 A -- public/private vehicles, and we sell them.

24 JUDGE STEINBERG: If it moves, you'll put it in
25 it?

1 THE WITNESS: If it moves, we'll radio it.

2 JUDGE STEINBERG: Okay. You said you do repeater
3 service. Explain to me what repeater service is.

4 THE WITNESS: We sell access to the repeater. In
5 other words, like someone owns a base station and mobile.
6 Okay. You need a repeater to be able to transmit.

7 JUDGE STEINBERG: Okay. Give me an example. I
8 mean, we have let's say you said an ambulance.

9 THE WITNESS: Yes.

10 JUDGE STEINBERG: An ambulance. Let's take an
11 ambulance. There is a vehicle that's an ambulance. Where
12 would the base station be, where the dispatcher is?

13 THE WITNESS: Probably back to the dispatcher.

14 JUDGE STEINBERG: And the repeater would be on
15 some hill somewhere?

16 THE WITNESS: Yes. Yes. High ground.

17 JUDGE STEINBERG: So if the dispatcher wanted to
18 contact the ambulance --

19 THE WITNESS: Okay.

20 JUDGE STEINBERG: -- how would your repeater come
21 into play?

22 THE WITNESS: Okay.

23 JUDGE STEINBERG: Explain that to me. You know,
24 these people out here know, but I'm dumb as a post.

25 THE WITNESS: Okay.

1 JUDGE STEINBERG: That's what I want you to
2 assume, especially with some of my rulings this morning.

3 THE WITNESS: Well, a repeater --

4 JUDGE STEINBERG: I don't know anything.

5 THE WITNESS: Okay. Okay. The dispatcher will
6 key up his radio.

7 JUDGE STEINBERG: By key up the radio, he pushes a
8 little button --

9 THE WITNESS: That's right.

10 JUDGE STEINBERG: -- and talks into a microphone?

11 THE WITNESS: Yes, sir. That will in turn hit the
12 repeater, and then the repeater --

13 JUDGE STEINBERG: Through magic?

14 THE WITNESS: Radio waves. It will hit the
15 repeater.

16 JUDGE STEINBERG: Go through space and go to the
17 repeater. Then what happens?

18 THE WITNESS: Then it would find the mobile.

19 JUDGE STEINBERG: Find the ambulance?

20 THE WITNESS: Uh-huh.

21 THE REPORTER: I'm sorry. Was that yes?

22 THE WITNESS: Yes.

23 JUDGE STEINBERG: Yes.

24 THE WITNESS: Find the ambulance. Then they will
25 talk.

1 JUDGE STEINBERG: Okay. Basically you have a
2 whole bunch of repeaters someplace and a whole bunch of
3 customers, and everybody talks?

4 THE WITNESS: Yes. That's all it is. The
5 repeater just gives you more range. I guess that's my --

6 JUDGE STEINBERG: So you put one --

7 THE WITNESS: Here and here.

8 JUDGE STEINBERG: By here, here and here, we're
9 just moving our hands randomly. Then whatever area is
10 covered by the signals people can talk back and forth in?

11 THE WITNESS: Yes.

12 JUDGE STEINBERG: Now I'm a little smarter than I
13 was before. Thank you.

14 BY MR. KNOWLES-KELLETT:

15 Q Approximately how big a range does the repeater
16 give you?

17 A I think it's about 40 miles. It may give more on
18 any given day, but that's basically a 40 mile radius is the
19 way we look at it, and that's the way we try to sell it.

20 Q It's reliable within 40 miles?

21 A Yes, because you don't want to sell something and
22 say I'm going to reach you to Timbuktu and then you have a
23 circle here, and you've got your 40 miles. Then you try to
24 get one over here and over here, and they kind of -- you
25 know, as you go along and drive you can get one versus the

1 other one. That's the thought behind it.

2 JUDGE STEINBERG: Do they hand calls off to each
3 other as you go?

4 THE WITNESS: Yes. They step them, or you could
5 go like your own with one is Dallas, two would be Fort
6 Worth, three would be Allen. There's a button on the radio,
7 and it makes it go from one repeater site to another.

8 JUDGE STEINBERG: And it does that automatically
9 so that if an ambulance is going --

10 THE WITNESS: No. If he wants to go to Allen, he
11 has to push a button.

12 JUDGE STEINBERG: He has to key in a two?

13 THE WITNESS: Yes.

14 JUDGE STEINBERG: Push a button?

15 THE WITNESS: Push a button to change the channel.

16 JUDGE STEINBERG: On the base station?

17 THE WITNESS: No. On the mobile or base station.

18 JUDGE STEINBERG: Okay. So they don't
19 automatically hand off?

20 THE WITNESS: No.

21 JUDGE STEINBERG: Just if the signal gets weak,
22 from experience they know you've got to push the number two?

23 THE WITNESS: Right. To pull your other signal
24 up.

25 JUDGE STEINBERG: Okay. I think I'm getting it.

1 THE WITNESS: Okay.

2 BY MR. KNOWLES-KELLETT:

3 Q Are most of the radios interconnected with a
4 telephone system?

5 A No.

6 Q Okay.

7 A They're strictly dispatch units.

8 Q Okay. Would the 900 ones be interconnected with a
9 telephone?

10 A No. They're dispatch mobiles.

11 Q Okay. Are any of the employees' mobiles in their
12 cars? Are they able to make phone calls on them?

13 A We have telephone lines because that's how we
14 access to turn people on and off. Yes, they could make a
15 phone call, a land line phone call.

16 Q Okay.

17 A We've never sold that on our system because we
18 think it ties up too much air time. We try to strictly
19 dispatch mobiles. We're not a telephone company.

20 Q If someone wants to chat with their wife, they --

21 A That's not what we want them to do.

22 Q Okay. What is the yearly gross revenue for DLB?

23 A Oh, God. Don't ask that.

24 Q Just a ball park number.

25 A I honestly could not even tell you right now. I

1 have not thought about it.

2 Q If I told you there was testimony in the ball park
3 of \$2 million per year --

4 A Yes. I would say that would be pretty close.

5 Q I'm not asking for within \$10,000 or whatever.

6 A No. I just can't do that with any -- I mean, I
7 might say well, it was \$160,000, you know, or something or
8 another, and it was way more. I won't do that because I
9 just can't do it. I'm not that -- that's not something I
10 make myself recall.

11 Q Okay.

12 A If I want to know it, I go look at the books.

13 Q Okay. Do you know what the salary is of the other
14 officers of the DLB?

15 A Yes, sir.

16 Q Okay. Could you go through that?

17 A We all basically make the same salary.

18 Q So does Ron --

19 A Ron? No. Ron does not make a salary. Ron is not
20 an employee.

21 Q Okay.

22 A He has retired.

23 Q Okay.

24 A David and Diane and I all basically make the same
25 salary approximately within a few dollars of one another. I

1 don't --

2 Q Okay. When did Ron stop getting a salary?

3 A When he turned 65 in November. His birthday is
4 the 15th of November, and he was given a retirement. He was
5 retired.

6 Q This was November of 2000?

7 A Well, he's 67. It was two years ago.

8 Q Okay. I don't know what year it was. I just know
9 when he turned 65.

10 JUDGE STEINBERG: Was that company policy that
11 made him retire at 65, or did you?

12 THE WITNESS: I did.

13 JUDGE STEINBERG: Okay.

14 THE WITNESS: I told him it's time. I was ready
15 to retire, so I told him it's time for us to get out. I
16 knew if he didn't get out I would never.

17 BY MR. KNOWLES-KELLETT:

18 Q So are you really retired from DLB?

19 A No, sir. Really, you know, we're training our son
20 and our daughter-in-law, and I guess as long as we'll be
21 stockholders and we will have a hand in operating the
22 business because it's just -- it's really too much for just
23 two people to do.

24 Q Okay.

25 A That's the reason we got our son and daughter-in-

1 law on board is we needed more help.

2 Q Okay. Who makes the big decisions at DLB?

3 A It is joint. I have the final say, but it is a
4 joint decision. We discuss it. We discuss among ourselves,
5 which would be the four of us.

6 Q Okay.

7 A You know, how much money do we have? We can buy
8 this. They tell us well, we need new equipment. Our
9 repeaters need to be upgraded. It's something we just sit
10 down and talk about, whether it be at home or work.

11 Q Okay. Is it true that work doesn't end at work?

12 A No, it does not. It never ends at work.

13 Q Do you know what percentage of DLB's income comes
14 from repeater fees just roughly?

15 A I would say maybe ten percent I would say. I'm
16 just guessing.

17 Q Okay.

18 A I never even thought about it just separate what
19 comes from repeaters, what comes from service. To me, it's
20 always been the whole.

21 Q Okay.

22 A If there's enough to pay the salaries, pay the
23 light bill and keep the inventory, that's fine with me as
24 long as we can keep our head above the water.

25 Q In the ordinary course of business, is there any

1 effort made to segregate out the repeater fees from any
2 other income of DLB?

3 A No, sir. There never has been. You know,
4 whenever we set it up I discussed with Jim is there a reason
5 for keeping anything separate, you know, whether it be, you
6 know, a repeater or repeater site, and he said there was no
7 reason to keep anything separate.

8 You know, this is the expense. This is going to
9 be the revenue, and it's going to all go into one checking
10 account. There's just no reason to separate it, as far as
11 he was concerned.

12 We did have a discussion, and I asked him would
13 there be any advantage or could he see any advantage in
14 doing it. He said no, and I relied on him to tell me how to
15 set it up.

16 Q Okay. Was there any effort then to break down
17 repeater fees by station?

18 A No, sir. We didn't. We tried to keep our
19 accounting as simple as possible, you know, and to meet his
20 software package versus my software package so they would be
21 compatible.

22 JUDGE STEINBERG: When you say his, do you mean
23 Jim's?

24 THE WITNESS: Yes. Jim's. Jim's software, you
25 know, so we could rely on it without having to have so much

1 I guess input from, you know, him having to start from
2 scratch every month because he did it all on a monthly
3 basis.

4 I didn't just take stuff to him once a year. I
5 took it to him monthly, and he reconciled my bank
6 statements. He went over my invoices. Like I said, he was
7 my advisor. He was the one that I counted on to tell you,
8 you know, do I need to do this. Hey, this is the wrong time
9 to do it. This is the right time to do it.

10 BY MR. KNOWLES-KELLETT:

11 Q Okay. What were your primary duties? What are
12 your primary duties at DLB?

13 A I --

14 MR. ROMNEY: Objection, Your Honor, as far as the
15 scope, the time. Are we talking right now?

16 MR. KNOWLES-KELLETT: I'm talking currently.

17 MR. ROMNEY: Currently?

18 THE WITNESS: Okay. I discuss the salaries. We
19 decide who's going to get a raise. We discuss health
20 insurance, if it's adequate, what it's gone up. That's part
21 of -- this is something that Diane and I discuss because
22 we're the ones that are dealing with the agents or whatever.

23 Any insurance, were it to be automobile, were it
24 to be the company liability insurance or anything, that is
25 something that Diane and I handle ourselves in taking in

1 consideration, whether it be negotiating a fee or trying to
2 find the best rate or making sure we got the right coverage.

3 MR. KNOWLES-KELLETT: Okay.

4 THE WITNESS: I do that, the paying of the bills.

5 BY MR. KNOWLES-KELLETT:

6 Q Do you refer to that as the accounts payable?

7 A Yes. Diane mostly handles in dealing with
8 receivables. We have discussions on who's delinquent and
9 who's paying and that type of thing. That's a joint concern
10 of ours that we both handle. If she doesn't get any word
11 then it's hey, I'm the last choice you have. The buck stops
12 here.

13 Q Okay. So you're more advisory on receivables?

14 A Yes, I am. I'm more advisory to her than actually
15 sitting down and doing that is what I do.

16 Q How many hours a week do you work at DLB now?

17 A Some weeks I don't go in. Some weeks I go in
18 three or four days a week. You know, it's just -- like I
19 said, it's mostly the time of the month it is. At the end
20 of the month I go in or the first of the month or if I'm
21 needed. You know, basically it's on an if I'm needed basis.

22 Q Okay. Previously, in the mid 1990s, how much did
23 you work at DLB?

24 A Every day.

25 Q And were your duties different then?

1 A Well, I done more of the actual paying of the
2 bills and keeping the -- more hands on, in other words. I
3 paid the bills, and Diane done more of talking to -- I mean,
4 you know, we had a lot of forms that we had to fill out
5 because we are a majority woman owned business.

6 We're a disadvantaged business, and there's lots
7 of things that we have to fill out every year and that type
8 of stuff. Diane done more like a secretary than she did
9 actually paying bills and that type of thing, and I did
10 that.

11 Q And so she's moved more into those?

12 A She tried to move more into what I did. Like I
13 said, if it gets too much then I have to help her basically
14 is the way it is.

15 Q Did you two do payroll as well?

16 A Yes, sir. Basically she's doing it now, but I did
17 -- before I, you know, decided that I wasn't going to be
18 there every day I did it, but since she's there more than I
19 am she does it. It's easier that way.

20 Q With respect to hiring and firing decisions, who
21 does that?

22 A Basically Diane and I have the authority over
23 hiring everyone in the office. The salespersons and
24 technical type people I would have the final say.

25 In other words, if I decided I don't want him then

1 I would tell them, you know, I don't care how great, how
2 much he can walk on water. I just have a -- I just don't
3 have a good feeling about this person. Yes, I would say
4 that.

5 Q Okay. So if I understand you correctly, there's
6 sort of an office accounting staff, and you and Diane are in
7 charge of that?

8 A Yes. We don't -- no one -- Ronald or David either
9 one does not interfere with what we consider the girls in
10 the front office. That's our -- they're going to work with
11 me, and I'm the one that's responsible for it.

12 Now, technical type people, you know, I'll receive
13 them as well as David does or Ron did, so I would have a say
14 in if we hired them or not.

15 Q Okay. But the sales manager and the service
16 manager and Ron and David would have sort of --

17 A They got first chance at them, and then we just
18 kind of --

19 Q They would bring their candidates to you for
20 approval --

21 A Right.

22 Q -- or discuss any hiring suggestions?

23 A Yes. We usually sat in together and talked with
24 them. You know, if I had an objection I told them, and they
25 told me what their reasoning was. We decided between us if

1 mine was strong enough to say no, we're not going to do it.

2 JUDGE STEINBERG: So if there was a tie vote, you
3 usually won?

4 THE WITNESS: Yes, sir.

5 BY MR. KNOWLES-KELLETT:

6 Q And is that the reason most of your siblings got
7 to work at DLB?

8 A Probably. They all have needs, and I'm a family
9 person. That was mostly my brother didn't have a job and
10 wasn't able to get one because he had worked at a company
11 for 14 years, and he needed a job. At that time we needed
12 someone, so I hired him. Susan was the same way.

13 JUDGE STEINBERG: When you say your brother, you
14 have more than one brother?

15 THE WITNESS: Thomas.

16 JUDGE STEINBERG: Thomas?

17 THE WITNESS: Thomas.

18 Susan, or Carolyn, she was divorced and had a
19 husband that wasn't paying child support, and she was
20 working for \$5 and something an hour. She was not making
21 it. I needed help, and I didn't feel like I would have a
22 problem working with my sister.

23 BY MR. KNOWLES-KELLETT:

24 Q The front office staff works a lot with customers?
25 Is that correct?

1 A Yes, sir.

2 Q Okay.

3 A They greet the customer usually first --

4 Q Okay.

5 A -- and generate the invoice or the work order to
6 go back to the technical people to work on the equipment,
7 you know.

8 Q Can you explain how the sales staff fits in with
9 the office staff in that regard?

10 A Well, the office staff would type up the sales
11 proposals. You know, that's what they did for the salesmen
12 and take telephone messages or get equipment out of the
13 stock room for them, whatever they needed, whether it be
14 demo work or whether it be a --

15 Q So customers operating a large number of mobiles
16 had more --

17 A Well, yes. They had more clout so to speak, yes.
18 They had more leverage. You're going to think what it's
19 going to take to get it.

20 Q There was a time in 1996 when you decided to
21 expand up to the Allen area? Is that correct?

22 A Yes.

23 Q 1995-1996?

24 A Yes, sir.

25 Q Do you recall when that was?

1 A We had this big customer that we knew we were
2 going to need more Spectrum in, you know, more areas, and
3 that was when we knew that, I mean, we needed to get
4 Spectrum in the Allen area.

5 Q Okay. Did you have any involvement in getting
6 that Spectrum?

7 A Well, mostly my husband dealt with John Black in
8 dealing with getting the license. Mostly he dealt with him,
9 you know. We knew that we needed it. I mean, I definitely
10 knew I needed it.

11 There wasn't any doubt in my mind, but Ronald
12 dealt more with it than I did respecting looking for it on
13 the big, long list and all that type of stuff and talking
14 with John Black and what was available and what we could do.

15 Q Were you aware that you needed to get licenses in
16 multiple names to be able to get all the licenses you
17 needed?

18 A Yes. I knew that there was a problem that they
19 told us that we couldn't get a license in multiple, you
20 know, like our names anymore; that we had to get a license
21 like we could only get one license.

22 JUDGE STEINBERG: When you said they, who is they?

23 THE WITNESS: John Black and my husband had talked
24 to the people at PCIA, and they said that we couldn't get
25 but one license per one, you know, person. We could only

1 hold one license.

2 JUDGE STEINBERG: Okay. And you didn't talk to
3 John Black?

4 THE WITNESS: No, sir, I did not.

5 JUDGE STEINBERG: And you didn't talk to PCIA?

6 THE WITNESS: No, sir.

7 JUDGE STEINBERG: Then this is what?

8 THE WITNESS: This is what Ron talked to them and
9 come back to me with is what this is, Judge.

10 THE REPORTER: Excuse me again, Your Honor. It is
11 going to be very difficult for the transcriber. There are
12 so many overlaps.

13 JUDGE STEINBERG: Okay. Do you want me to start
14 again?

15 THE REPORTER: No.

16 JUDGE STEINBERG: Did you get it?

17 THE REPORTER: They can get it, but just in
18 general it's really important to wait until the question has
19 been asked because this whole thing has to be transcribed
20 from the tape later, so if you could just wait until the
21 question is --

22 THE WITNESS: Okay. Until he hushes for me to
23 start? Okay. I'll try.

24 THE REPORTER: We can't talk like normally we do
25 in conversations.

1 THE WITNESS: Okay. That's fine. I'm sure I am
2 because I'm very good at doing that.

3 THE REPORTER: Thank you. I appreciate it very
4 much.

5 THE WITNESS: I'll do better, I hope. I'll try,
6 Your Honor.

7 BY MR. KNOWLES-KELLETT:

8 Q I would ask you to turn your attention to the big
9 notebook there.

10 A This one, sir?

11 Q It's got Exhibit 19 in it. At the bottom of the
12 pages further down there are numbers, six digit numbers. I
13 would like you to go to 000229.

14 A 29? Okay.

15 Q Almost halfway through the book.

16 A Right there? 00?

17 Q 229.

18 A 229? Sorry. I got to 29. I'm just getting to 29
19 and forgetting the rest of it. Okay. I have that page.

20 Q There's been testimony that this was sent from
21 Metroplex Two-Way to John Black as part of the Allen
22 expansion. Do you recognize this document?

23 A Yes, sir. This would be something that I believe
24 Susan Lutz would have typed up for us to send. Ron usually
25 gave it to me, and I took it to Susan to type.